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6 Attorneys for Plaintiff  
United States of America  
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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 GAL YIFRACH, NICK SHKOLNIK,  
aka Nickita Shkolnik, SHALOM IFRAH, and  
15 SCHNEUR ZALMAN GETZEL  
ROSENFELD,  
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17 Defendants.  
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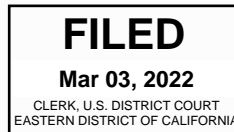
CASE NO. 2:22-cr-0046 TLN

PETITION TO SEAL INDICTMENT

19 TO THE HONORABLE JEREMY D. PETERSON, UNITED STATES MAGISTRATE  
20 JUDGE:

21 COMES NOW MIRIAM R. HINMAN, Assistant United States Attorney for the Eastern District  
22 of California, to petition this Court and respectfully represent:

- 23 1. I have presented to the Grand Jury now in session in the City of Sacramento, California, one  
24 proposed indictment charging the above-named defendants with violations of Title 18 United  
25 States Code, Sections 1955(a), 1956(h) (2 counts), and 981(a)(1)(C), 982(a)(1), and 1955(d),  
26 and Title 28 United States Code, Section 2461(c).  
27 2. The indictment has been returned by the Grand Jury to this Honorable Court.  
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SEALED

1           3. The investigating agent believes that the above-named defendants pose a flight risk if the  
2 charges are made public before arrests are effected.

3           THEREFORE, your petitioner prays that the aforesaid indictment, this Petition, and the Order to  
4 Seal be sealed pursuant to Rule 6(e)(4) of the Federal Rules of Criminal Procedure until the defendants'  
5 arrests or until further order of this Court.

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7       DATED: March 3, 2022

Respectfully Submitted,

8           PHILLIP A. TALBERT  
9           United States Attorney

10       By:



11           MIRIAM R. HINMAN  
12           Assistant U.S. Attorney  
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